

MARQUIS AURBACH

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach

Brian R. Hardy, Esq.
Nevada Bar No. 10068
Susan E. Gillespie, Esq.
Nevada Bar. No 15227
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
bhardy@maclaw.com
sgillespie@maclaw.com

Attorneys for Defendant Jonas Frey

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEVELS NETWORK, INC., a Delaware corporation; and AW BETEILIGUNGS GMBH, a limited liability company organized under the laws of Germany,

Plaintiffs,

vs.

JONAS FREY, an individual,

Defendant.

Case Number:
2:21-CV-01796-RFB-BNW

**STIPULATION AND ORDER TO STAY
DISCOVERY AND OTHER
DEADLINES PENDING SETTLEMENT
DISCUSSIONS**

(FIRST REQUEST)

Defendant Jonas Frey, by and through his counsel, Marquis Aurbach, and Plaintiffs Levels Network, Inc. and AW Beteiligungs GmbH, by and through their counsel of record, Holley Driggs, Ltd. and Wuersch & Gering LLP (collectively the “Parties”), hereby stipulate and agree to stay discovery for thirty (30) days in the above-referenced matter. This Stipulation is being entered in good faith and not for purposes of delay.

1. During recent communication regarding upcoming discovery deadlines, the Parties determined that this matter may be appropriate for possible resolution and that a stay of discovery and other deadlines would allow the Parties to explore the possibility of settlement, without incurring the time and expense of ongoing discovery and other work during settlement discussions.

2. The Parties agree that all deadlines in this matter be stayed for a thirty (30) day period as of the date hereof.

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3. The Parties further agree that within five (5) days after completion of the contemplated settlement discussions, if not successful, the Parties will submit a stipulated schedule regarding any pending motions or discovery which will extend all applicable dates for the commensurate time period that they were stayed in accordance with Rule 26 of the Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States District Court, for the Court's approval.

4. The Parties further agree that if any Party determines that the settlement discussions have become futile prior to the end of the stay, that party may unilaterally notify the other party and within (5) days after such notice, the Parties will submit a stipulated schedule regarding any pending motions or discovery which will extend all applicable dates for the commensurate time period that they were stayed in accordance with Rule 26 of the Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States District Court, for the Court's approval.

5. Accordingly, the Parties hereby agree and request the Court to enter a stay of all deadlines in the instant case.

6. This is the Parties' first request for a stay of deadlines in this matter.

7. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate in the exchange of information as needed to facilitate settlement.

8. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

IT IS SO STIPULATED this 29th day of August, 2022.

MARQUIS AURBACH

HOLLEY DRIGGS

By: s/Susan E. Gillespie
Brian R. Hardy, Esq.
Nevada Bar No. 10068
Susan E. Gillespie, Esq.
Nevada Bar. No 15227
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Defendant

By: s/Brian W. Boschee
Brian W. Boschee, Esq.
Nevada Bar No. 7612
James D. Boyle, Esq.
Nevada Bar No. 8384
300 South Fourth Street, Ste. 1600
Las Vegas, Nevada 89101
Attorneys for Plaintiffs

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WUERSCH & GERING LLP

By: s/Kevin Murphy
Kevin Murphy, Esq. (phv)
Claudio A. Guler, Esq. (phv)
WUERSCH & GERING LLP
100 Wall St. 10th Floor
New York, NY 10005
Attorneys for Plaintiffs

ORDER
IT IS SO ORDERED

DATED: 12:24 pm, August 31, 2022



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

MARQUIS AURBACH
10001 Park Run Drive
Las Vegas, Nevada 89145
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